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Counsel for Petitioner Novalpina Capital Partners I GP S.À.R.L.

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

**IN RE PETITION OF NOALPINA
CAPITAL PARTNERS I GP S.À.R.L. FOR
JUDICIAL ASSISTANCE PURSUANT TO
28 U.S.C. § 1782**

Case No. 3:23-mc-00082 IM

**DECLARATION OF TARA J.
PLOCHOCKI**

I, Tara J. Plochocki, declare pursuant to 28 U.S.C. § 1746 as follows:

1. I am a partner in the law firm Lewis Baach Kaufmann Middlemiss pllc, attorneys for Novalpina Capital Partners I GP S.a.r.l. (“Novalpina GP”).
2. I submit this declaration in support of the Petition submitted by Novalpina GP for an order pursuant to 28 U.S.C § 1782 to take discovery from Tobias Read and Michael Langdon.

Declaration of Tara J. Plochocki
In Support of Ex Parte Petition
Pursuant to 28 U.S.C. § 1782

3. Tobias Read is the Oregon State Treasurer. Attached hereto as Exhibit 1 is a true and correct copy of a page from the Oregon State Treasury's website, available at <https://www.oregon.gov/treasury/about-treasurer-read/pages/default.aspx>.
4. Attached hereto as Exhibit 2 is a true and correct copy of an excerpt of a December 8, 2021 Report of the Oregon Investment Council. At page 5, it indicates that the Office of the State Treasurer of the State of Oregon held a meeting on October 27, 2021. Michael Langdon is listed among the Staff Present.
5. I am informed that Mr. Langdon has used and continues to use the email address Michael.Langdon@ost.state.or.us for communications relating to the Fund. On January 23, 2023, I typed "ost.state.or.us" into an internet browser, which pulled up the Oregon State Treasury homepage.
6. Attached hereto as Exhibit 3 is a true and correct copy of Michael Langdon's LinkedIn profile, last checked on January 10, 2023.
7. Attached hereto as Exhibit 4 is a true and correct copy of the profile of Mr. Read maintained on the Oregon State Treasury webpage, available at <https://www.oregon.gov/treasury/about-treasurer-read/pages/default.aspx>.
8. Attached hereto as Exhibit 5 is a draft of the Document Requests to accompany the subpoenas to Michael Langdon and Tobias Read.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 27, 2023



Tara J. Plochocki